

Jamie Wright, J.D., Chair
Panel A

1 XAVIER BECERRA
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8 **BEFORE THE**
9 **MEDICAL BOARD OF CALIFORNIA**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. 800-2016-023788

12 **RAAD JEIROUDI, M.D.**
13 **17150 Euclid Street**
Fountain Valley, CA 92708

OAH No. 2016090618

14 **Physician's and Surgeon's Certificate No.**
15 **A56133,**

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

16 Respondent.

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 PARTIES

21 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board
22 of California (Board). Complainant brought this action solely in her official capacity and is
23 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
24 Brian D. Bill, Deputy Attorney General.

25 2. Respondent RAAD JEIROUDI, M.D. (Respondent) is represented in this proceeding
26 by attorney Michael J. Trotter, Esq., whose address is 111 W. Ocean Boulevard, 14th Floor, P.O.
27 Box 22636, Long Beach, California 90801.

28 3. On or about May 29, 1996, the Board issued Physician's and Surgeon's Certificate

1 No. A56133 to RAAD JEIROUDI, M.D. (Respondent). The Physician's and Surgeon's
2 Certificate will expire on April 13, 2018, unless renewed.

3 JURISDICTION

4 4. Accusation No. 800-2016-023788 was filed before the Board, and is currently
5 pending against Respondent. The Accusation and all other statutorily required documents were
6 properly served on Respondent on August 29, 2016. Respondent timely filed his Notice of
7 Defense contesting the Accusation.

8 5. A copy of Accusation No. 800-2016-023788 is attached as exhibit A and incorporated
9 herein by reference.

10 ADVISEMENT AND WAIVERS

11 6. Respondent has carefully read, and understands the charges and allegations in
12 Accusation No. 800-2016-023788. Respondent has also carefully read, and understands the
13 effects of this Stipulated Settlement and Disciplinary Order.

14 7. Respondent is fully aware of his legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
16 his own expense; the right to confront and cross-examine the witnesses against him; the right to
17 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel
18 the attendance of witnesses and the production of documents; the right to reconsideration and
19 court review of an adverse decision; and all other rights accorded by the California
20 Administrative Procedure Act and other applicable laws.

21 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
22 every right set forth above.

23 CULPABILITY

24 9. Respondent admits the truth of each and every charge and allegation in Accusation
25 No. 800-2016-023788.

26 10. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
27 discipline and he agrees to be bound by the Board's probationary terms as set forth in the
28 Disciplinary Order below.

1 CONTINGENCY

2 11. This stipulation shall be subject to approval by the Medical Board of California.
3 Respondent understands and agrees that counsel for Complainant and the staff of the Medical
4 Board of California may communicate directly with the Board regarding this stipulation and
5 settlement, without notice to or participation by Respondent. By signing the stipulation,
6 Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the
7 stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this
8 stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of
9 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between
10 the parties, and the Board shall not be disqualified from further action by having considered this
11 matter.

12 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
13 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
14 signatures thereto, shall have the same force and effect as the originals.

15 13. In consideration of the foregoing admissions and stipulations, the parties agree that
16 the Board may, without further notice or formal proceeding, issue and enter the following
17 Disciplinary Order:

18 DISCIPLINARY ORDER

19 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A56133 issued
20 to Respondent RAAD JEIROUDI, M.D. is revoked. However, the revocation is stayed and
21 Respondent is placed on probation for three (3) years on the following terms and conditions.

22 1. EDUCATION COURSE. Within 60 calendar days of the effective date of this
23 Decision, and on an annual basis thereafter, Respondent shall submit to the Board or its designee
24 for its prior approval educational program(s) or course(s) which shall not be less than 40 hours
25 per year, for each year of probation. The educational program(s) or course(s) shall be aimed at
26 correcting any areas of deficient practice or knowledge and shall be Category I certified. The
27 educational program(s) or course(s) shall be at Respondent's expense and shall be in addition to
28 the Continuing Medical Education (CME) requirements for renewal of licensure. Following the

1 completion of each course, the Board or its designee may administer an examination to test
2 Respondent's knowledge of the course. Respondent shall provide proof of attendance for 65
3 hours of CME of which 40 hours were in satisfaction of this condition.

4 2. PROFESSIONALISM PROGRAM (ETHICS COURSE). Within 60 calendar days of
5 the effective date of this Decision, Respondent shall enroll in a professionalism program, that
6 meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.
7 Respondent shall participate in and successfully complete that program. Respondent shall
8 provide any information and documents that the program may deem pertinent. Respondent shall
9 successfully complete the classroom component of the program not later than six (6) months after
10 Respondent's initial enrollment, and the longitudinal component of the program not later than the
11 time specified by the program, but no later than one (1) year after attending the classroom
12 component. The professionalism program shall be at Respondent's expense and shall be in
13 addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

14 A professionalism program taken after the acts that gave rise to the charges in the
15 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board
16 or its designee, be accepted towards the fulfillment of this condition if the program would have
17 been approved by the Board or its designee had the program been taken after the effective date of
18 this Decision.

19 Respondent shall submit a certification of successful completion to the Board or its
20 designee not later than 15 calendar days after successfully completing the program or not later
21 than 15 calendar days after the effective date of the Decision, whichever is later.

22 3. CLINICAL TRAINING PROGRAM. Within six (6) months of the effective date of
23 this Decision, Respondent shall enroll in a clinical training or educational program equivalent to
24 the Physician Assessment and Clinical Education Program (PACE) offered at the University of
25 California - San Diego School of Medicine ("Program"). Respondent shall successfully complete
26 the Program not later than six (6) months after Respondent's initial enrollment unless the Board
27 or its designee agrees in writing to an extension of that time.

28 The Program shall consist of a Comprehensive Assessment program comprised of a two-

1 day assessment of Respondent's physical and mental health; basic clinical and communication
2 skills common to all clinicians; and medical knowledge, skill and judgment pertaining to
3 Respondent's area of practice in which Respondent was alleged to be deficient, and at minimum,
4 a 40 hour program of clinical education in the area of practice in which Respondent was alleged
5 to be deficient and which takes into account data obtained from the assessment, Decision(s),
6 Accusation(s), and any other information that the Board or its designee deems relevant.
7 Respondent shall pay all expenses associated with the clinical training program.

8 Based on Respondent's performance and test results in the assessment and clinical
9 education, the Program will advise the Board or its designee of its recommendation(s) for the
10 scope and length of any additional educational or clinical training, treatment for any medical
11 condition, treatment for any psychological condition, or anything else affecting Respondent's
12 practice of medicine. Respondent shall comply with Program recommendations.

13 At the completion of any additional educational or clinical training, Respondent shall
14 submit to and pass an examination. Determination as to whether Respondent successfully
15 completed the examination or successfully completed the program is solely within the program's
16 jurisdiction.

17 If Respondent fails to enroll, participate in, or successfully complete the clinical training
18 program within the designated time period, Respondent shall receive a notification from the
19 Board or its designee to cease the practice of medicine within three (3) calendar days after being
20 so notified. The Respondent shall not resume the practice of medicine until enrollment or
21 participation in the outstanding portions of the clinical training program have been completed. If
22 the Respondent did not successfully complete the clinical training program, the Respondent shall
23 not resume the practice of medicine until a final decision has been rendered on the accusation
24 and/or a petition to revoke probation. The cessation of practice shall not apply to the reduction of
25 the probationary time period.

26 4. MONITORING - PRACTICE. Within 30 calendar days of the effective date of this
27 Decision, Respondent shall submit to the Board or its designee for prior approval as a practice
28 monitor, the name and qualifications of one or more licensed physicians and surgeons whose

1 licenses are valid and in good standing, and who are preferably American Board of Medical
2 Specialties (ABMS) certified. A monitor shall have no prior or current business or personal
3 relationship with Respondent, or other relationship that could reasonably be expected to
4 compromise the ability of the monitor to render fair and unbiased reports to the Board, including
5 but not limited to any form of bartering, shall be in Respondent's field of practice, and must agree
6 to serve as Respondent's monitor. Respondent shall pay all monitoring costs.

7 The Board or its designee shall provide the approved monitor with copies of the Decision(s)
8 and Accusation(s), and a proposed monitoring plan. Within 15 calendar days of receipt of the
9 Decision(s), Accusation(s), and proposed monitoring plan, the monitor shall submit a signed
10 statement that the monitor has read the Decision(s) and Accusation(s), fully understands the role
11 of a monitor, and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees
12 with the proposed monitoring plan, the monitor shall submit a revised monitoring plan with the
13 signed statement for approval by the Board or its designee.

14 Within 60 calendar days of the effective date of this Decision, and continuing throughout
15 probation, Respondent's practice shall be monitored by the approved monitor. Respondent shall
16 make all records available for immediate inspection and copying on the premises by the monitor
17 at all times during business hours and shall retain the records for the entire term of probation.

18 If Respondent fails to obtain approval of a monitor within 60 calendar days of the effective
19 date of this Decision, Respondent shall receive a notification from the Board or its designee to
20 cease the practice of medicine within three (3) calendar days after being so notified. Respondent
21 shall cease the practice of medicine until a monitor is approved to provide monitoring
22 responsibility.

23 The monitor(s) shall submit a quarterly written report to the Board or its designee which
24 includes an evaluation of Respondent's performance, indicating whether Respondent's practices
25 are within the standards of practice of medicine and whether Respondent is practicing medicine
26 safely. It shall be the sole responsibility of Respondent to ensure that the monitor submits the
27 quarterly written reports to the Board or its designee within 10 calendar days after the end of the
28 preceding quarter.

1 If the monitor resigns or is no longer available, Respondent shall, within five (5) calendar
2 days of such resignation or unavailability, submit to the Board or its designee, for prior approval,
3 the name and qualifications of a replacement monitor who will be assuming that responsibility
4 within 15 calendar days. If Respondent fails to obtain approval of a replacement monitor within
5 60 calendar days of the resignation or unavailability of the monitor, Respondent shall receive a
6 notification from the Board or its designee to cease the practice of medicine within three (3)
7 calendar days after being so notified Respondent shall cease the practice of medicine until a
8 replacement monitor is approved and assumes monitoring responsibility.

9 In lieu of a monitor, Respondent may participate in a professional enhancement program
10 equivalent to the one offered by the Physician Assessment and Clinical Education Program at the
11 University of California, San Diego School of Medicine, that includes, at minimum, quarterly
12 chart review, semi-annual practice assessment, and semi-annual review of professional growth
13 and education. Respondent shall participate in the professional enhancement program at
14 Respondent's expense during the term of probation.

15 5. NOTIFICATION. Within seven (7) days of the effective date of this Decision, the
16 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the
17 Chief Executive Officer at every hospital where privileges or membership are extended to
18 Respondent, at any other facility where Respondent engages in the practice of medicine,
19 including all physician and locum tenens registries or other similar agencies, and to the Chief
20 Executive Officer at every insurance carrier which extends malpractice insurance coverage to
21 Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15
22 calendar days.

23 This condition shall apply to any change(s) in hospitals, other facilities or insurance carrier.

24 6. SUPERVISION OF PHYSICIAN ASSISTANTS. During probation, Respondent is
25 prohibited from supervising physician assistants.

26 7. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, all rules
27 governing the practice of medicine in California and remain in full compliance with any court
28 ordered criminal probation, payments, and other orders.

1 8. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations
2 under penalty of perjury on forms provided by the Board, stating whether there has been
3 compliance with all the conditions of probation.

4 Respondent shall submit quarterly declarations not later than 10 calendar days after the end
5 of the preceding quarter.

6 9. GENERAL PROBATION REQUIREMENTS.

7 Compliance with Probation Unit

8 Respondent shall comply with the Board's probation unit and all terms and conditions of
9 this Decision.

10 Address Changes

11 Respondent shall, at all times, keep the Board informed of Respondent's business and
12 residence addresses, email address (if available), and telephone number. Changes of such
13 addresses shall be immediately communicated in writing to the Board or its designee. Under no
14 circumstances shall a post office box serve as an address of record, except as allowed by Business
15 and Professions Code section 2021(b).

16 Place of Practice

17 Respondent shall not engage in the practice of medicine in Respondent's or patient's place
18 of residence, unless the patient resides in a skilled nursing facility or other similar licensed
19 facility.

20 License Renewal

21 Respondent shall maintain a current and renewed California physician's and surgeon's
22 license.

23 Travel or Residence Outside California

24 Respondent shall immediately inform the Board or its designee, in writing, of travel to any
25 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty
26 (30) calendar days.

27 In the event Respondent should leave the State of California to reside or to practice
28 Respondent shall notify the Board or its designee in writing 30 calendar days prior to the dates of

1 departure and return.

2 10. INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Respondent shall be
3 available in person upon request for interviews either at Respondent's place of business or at the
4 probation unit office, with or without prior notice throughout the term of probation.

5 11. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
6 its designee in writing within 15 calendar days of any periods of non-practice lasting more than
7 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is
8 defined as any period of time Respondent is not practicing medicine in California as defined in
9 Business and Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month
10 in direct patient care, clinical activity or teaching, or other activity as approved by the Board. All
11 time spent in an intensive training program which has been approved by the Board or its designee
12 shall not be considered non-practice. Practicing medicine in another state of the United States or
13 Federal jurisdiction while on probation with the medical licensing authority of that state or
14 jurisdiction shall not be considered non-practice. A Board-ordered suspension of practice shall
15 not be considered as a period of non-practice.

16 In the event Respondent's period of non-practice while on probation exceeds 18 calendar
17 months, Respondent shall successfully complete a clinical training program that meets the criteria
18 of Condition 18 of the current version of the Board's "Manual of Model Disciplinary Orders and
19 Disciplinary Guidelines" prior to resuming the practice of medicine.

20 Respondent's period of non-practice while on probation shall not exceed two (2) years.

21 Periods of non-practice will not apply to the reduction of the probationary term.

22 Periods of non-practice will relieve Respondent of the responsibility to comply with the
23 probationary terms and conditions with the exception of this condition and the following terms
24 and conditions of probation: Obey All Laws; and General Probation Requirements.

25 12. COMPLETION OF PROBATION. Respondent shall comply with all financial
26 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
27 completion of probation. Upon successful completion of probation, Respondent's certificate shall
28 be fully restored.

1 13. VIOLATION OF PROBATION. Failure to fully comply with any term or condition
2 of probation is a violation of probation. If Respondent violates probation in any respect, the
3 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and
4 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke
5 Probation, or an Interim Suspension Order is filed against Respondent during probation, the
6 Board shall have continuing jurisdiction until the matter is final, and the period of probation shall
7 be extended until the matter is final.

8 14. LICENSE SURRENDER. Following the effective date of this Decision, if
9 Respondent ceases practicing due to retirement or health reasons or is otherwise unable to satisfy
10 the terms and conditions of probation, Respondent may request to surrender his or her license.
11 The Board reserves the right to evaluate Respondent's request and to exercise its discretion in
12 determining whether or not to grant the request, or to take any other action deemed appropriate
13 and reasonable under the circumstances. Upon formal acceptance of the surrender, Respondent
14 shall within 15 calendar days deliver Respondent's wallet and wall certificate to the Board or its
15 designee and Respondent shall no longer practice medicine. Respondent will no longer be subject
16 to the terms and conditions of probation. If Respondent re-applies for a medical license, the
17 application shall be treated as a petition for reinstatement of a revoked certificate.

18 15. PROBATION MONITORING COSTS. Respondent shall pay the costs associated
19 with probation monitoring each and every year of probation, as designated by the Board, which
20 may be adjusted on an annual basis. Such costs shall be payable to the Medical Board of
21 California and delivered to the Board or its designee no later than January 31 of each calendar
22 year.

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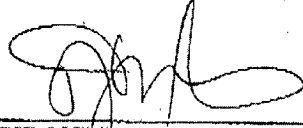
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ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 3/21/17



RAAD JEIROUDI, M.D.
Respondent

I have read and fully discussed with Respondent RAAD JEIROUDI, M.D. the terms and conditions and other matters contained in this Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 3/21/17



MICHAEL J. TROTTER, ESQ.
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California.

Dated:

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
JUDITH T. ALVARADO
Supervising Deputy Attorney General

BRIAN D. BILL
Deputy Attorney General
Attorneys for Complainant

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1 ACCEPTANCE

2 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
3 stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this
4 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
5 to be bound by the Decision and Order of the Medical Board of California.

6
7 DATED: _____

8 RAAD JEIROUDI, M.D.
9 *Respondent*

10 I have read and fully discussed with Respondent RAAD JEIROUDI, M.D. the terms and
11 conditions and other matters contained in this Stipulated Settlement and Disciplinary Order. I
12 approve its form and content.

13 DATED: _____

14 MICHAEL J. TROTTER, ESQ.
15 *Attorney for Respondent*

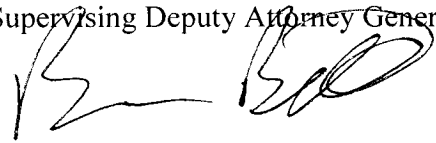
16 ENDORSEMENT

17 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
18 submitted for consideration by the Medical Board of California.

19
20 Dated: 3-21-17

Respectfully submitted,

21 XAVIER BECERRA
22 Attorney General of California
23 JUDITH T. ALVARADO
24 Supervising Deputy Attorney General

25 
26 BRIAN D. BILL
27 Deputy Attorney General
28 *Attorneys for Complainant*

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Exhibit A

Accusation No. 800-2016-023788

1 KAMALA D. HARRIS
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2 JUDITH T. ALVARADO
Supervising Deputy Attorney General
3 BRIAN D. BILL
Deputy Attorney General
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7 *Attorneys for Complainant*

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO *Aug 29 20 16*
BY *[Signature]* ANALYST

8 BEFORE THE
9 MEDICAL BOARD OF CALIFORNIA
10 DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. 800-2016-023788

12 **Raad Jeiroudi, M.D.**
13 **17150 Euclid Street, Suite 216**
Fountain Valley, CA 92708

A C C U S A T I O N

14 **Physician's and Surgeon's Certificate**
15 **No. A56133,**

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

20 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official
21 capacity as the Executive Director of the Medical Board of California, Department of Consumer
22 Affairs (Board).

23 2. On or about May 29, 1996, the Medical Board issued Physician's and Surgeon's
24 Certificate Number A56133 to Raad Jeiroudi, M.D. (Respondent). The Physician's and Surgeon's
25 Certificate was in full force and effect at all times relevant to the charges brought herein and will
26 expire on April 30, 2018, unless renewed.

27 //

28 //

JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2004 of the Code states:

“The board shall have the responsibility for the following:

“(a) The enforcement of the disciplinary and criminal provisions of the Medical Practice Act.

“(b) The administration and hearing of disciplinary actions.

“(c) Carrying out disciplinary actions appropriate to findings made by a panel or an administrative law judge.

“(d) Suspending, revoking, or otherwise limiting certificates after the conclusion of disciplinary actions.

“(e) Reviewing the quality of medical practice carried out by physician and surgeon certificate holders under the jurisdiction of the board.

“(f) Approving undergraduate and graduate medical education programs.

“(g) Approving clinical clerkship and special programs and hospitals for the programs in subdivision (f).

“(h) Issuing licenses and certificates under the board's jurisdiction.

“(i) Administering the board's continuing medical education program.”

5. Section 2227 of the Code states:

“(a) A licensee whose matter has been heard by an administrative law judge of the Medical Quality Hearing Panel¹ as designated in Section 11371 of the Government Code, or whose default has been entered, and who is found guilty, or who has entered into a stipulation for disciplinary action with the board, may, in accordance with the provisions of this chapter:

¹ Business and Professions Code section 2002, effective January 1, 2008, provides that, unless otherwise expressly provided, the term “board” as used in the State Medical Practice Act (Bus. & Prof. Code, § 2000 et seq.) means the “Medical Board of California,” and references to the “Division of Medical Quality” and “Division of Licensing” in the Act or any other provision of law shall be deemed to refer to the Board.

“(1) Have his or her license revoked upon order of the board.

“(2) Have his or her right to practice suspended for a period not to exceed one year upon order of the board.

“(3) Be placed on probation and be required to pay the costs of probation monitoring upon order of the board.

“(4) Be publicly reprimanded by the board. The public reprimand may include a requirement that the licensee complete relevant educational courses approved by the board.

“(5) Have any other action taken in relation to discipline as part of an order of probation, as the board or an administrative law judge may deem proper.

“(b) Any matter heard pursuant to subdivision (a), except for warning letters, medical review or advisory conferences, professional competency examinations, continuing education activities, and cost reimbursement associated therewith that are agreed to with the board and successfully completed by the licensee, or other matters made confidential or privileged by existing law, is deemed public, and shall be made available to the public by the board pursuant to Section 803.1.”

6. Section 2234 of the Code, states:

“The board shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

“(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the violation of, or conspiring to violate any provision of this chapter.

“ ”
...

CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

7. Respondent Raad Jeiroudi, M.D. is subject to disciplinary action under section 2234, subdivision (a), in that he failed to complete the Physician Assessment and Clinical Education Program (PACE) at the University of California, San Diego, pursuant to an April 18, 2012 Public Letter of Reprimand Agreement. The circumstances are as follows:

1 8. On or about April 18, 2012, the Board offered to resolve an action that involved
2 allegations of incompetence and failure to maintain adequate records (in violation of Business and
3 Professions Code sections 2234(d) and 2266 respectively), by way of Public Letter of Reprimand.
4 In order to avail himself of the offer, Respondent would agree to enroll in the PACE program no
5 later than 60 days after the acceptance of the PLR and complete the PACE program within six
6 months of the initial enrollment in the program. Additionally, Respondent would be required to
7 attend and complete a recordkeeping course and an anesthesiology course.

8 10. On or about April 29, 2012, Respondent entered into a written agreement to accept
9 the PLR in lieu of an Accusation, and to be bound by the terms of the agreement.

10 11. On or about May 9, 2012, the Board issued a PLR to Respondent.

11 12. On or about July 22, 2012, and July 23, 2012, Respondent attended and completed a
12 medical record keeping course, pursuant to the PLR requirements. On or about July 24, 2012,
13 Respondent provided proof of completion of the course of the Board.

14 13. On or about August 8, 2012, Respondent provided two certificates of completion
15 from for anesthesiology course, pursuant to the PLR requirement.

16 14. On or about May 15, 2013, Respondent attended Phase I of the PACE Program.
17 According to PACE staff, Respondent performed poorly and recommended that he undergo a
18 rigorous course of self-study prior to completing Phase II of the PACE Program.

19 15. On or about September 25, 2014, the Board sent a letter to Respondent regarding his
20 failure to submit proof of completion of Phase II of the PACE Program. To date, no response has
21 been received.

22 16. On or about June 30, 2015, the Board sent a letter to Respondent regarding his failure
23 to submit proof of completion of Phase II of the PACE Program. To date, no response has been
24 received.

25 17. On or about July 22, 2015, Respondent submitted payment to attend Phase II of the
26 PACE Program.

1 18. On or about December 9, 2015, the Board sent a letter to Respondent regarding his
2 failure to submit proof of completion of Phase II of the PACE Program. To date, no response has
3 been received.

4 19. On or about June 20, 2016, PACE Program administrators informed the Board that
5 Respondent has yet to attend Phase II of the PACE Program.

6 **DISCIPLINARY CONSIDERATIONS**

7 20. To determine the degree of discipline, if any, to be imposed on Respondent Raad
8 Jeiroudi, M.D., Complainant alleges that on or about May 9, 2012, in a prior disciplinary action
9 entitled *In the Matter of the Reprimand Against Raad Jeiroudi, M.D.* before the Medical Board of
10 California, in Case Number 04-2010-209109, a public letter of reprimand was issued against
11 Respondent's license due to incompetence, in violation of Business and Professions Code section
12 2234(d), and a failure to maintain adequate records, in violation of Business and Professions
13 Code section 2266.

14 **PRAYER**

15 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
16 and that following the hearing, the Medical Board of California issue a decision:

- 17 1. Revoking or suspending Physician's and Surgeon's Certificate Number A56133,
18 issued to Raad Jeiroudi, M.D.;
- 19 2. Revoking, suspending or denying approval of Raad Jeiroudi, M.D.'s authority to
20 supervise physician assistants, pursuant to section 3527 of the Code;
- 21 3. Ordering Raad Jeiroudi, M.D., if placed on probation, to pay the Board the costs of
22 probation monitoring; and
- 23 4. Taking such other and further action as deemed necessary and proper.

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25 DATED: August 29, 2016


KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant